Massachusetts Department of Environmental Protection
Bureau of Waste Prevention – Industrial Wastewater

BWP IW 38 & BWP IW 39

Permit for Industrial Sewer User

W901320
Transmittal Number

1201504 (AQ#)
{FMF # 204932}
Facility ID# (if known)

DEP Use Only

Date Received

Important Instructions for Completing This Form

The questions on this form apply to existing and new facilities discharging industrial wastewater to sewers. If you are completing this form for an existing facility, answer the questions as they apply to its current status. If you are completing this form for a new facility, your answers will reflect your commitment to comply with the requirements as set forth in each question.

Existing facilities are defined as facilities in existence as of July 12, 2007. New facilities are defined as facilities constructed after July 12, 2007.

Answer all questions, except those that you are directed to skip. Please DO NOT answer questions that you are directed to skip

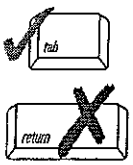
Permit Category (Select One)

☐ BWP IW 38: Industrial Sewer User in IPP POTW discharging more than 50,000 GPD

☒ BWP IW 39: Industrial Sewer User in Non-IPP POTW discharging more than 25,000 GPD

A. Facility Information

Important: When filling out forms on the computer, use only the tab key to move your cursor - do not use the return key.



Milford Power, LP
1a. Facility Name

108 National Street
1b. Facility Address 1

1c. Facility Address 2

Milford
1d. City

MA
1e. State

01757
1f. Zip Code

508-482-7400
1g. Phone Number

508-634-4021
1h. Fax Number

76-0321091
1i. Federal Employer Tax Identification Number (FEIN or TIN)

Mailing Address: ☒ Check here if same as Facility Address and skip to Contact Information.

2a. Mailing Address: Street or P.O. Box

2b. Mailing Address 2

2c. City

2d. State

2e. Zip Code

Contact Information:

Robert Maggiani
3a. Contact Person Name

Corporate HSE Manager
3b. Contact Person Title

508-382-9358
3c. Phone Number

774-696-3906 (cell phone)
3d. Extension

rmaggiani@anpower.com
3e. Email Address

B. Industrial Wastewater Information

1. Project Description (Check All That Apply)

- ☐ 1a. New Construction
- ☒ 1b. Permit Renewal
- ☐ 1c. Increasing Flow From Existing Connection
- ☐ 1d. New or Modified Industrial Wastewater Pretreatment System (IWPS)
- ☐ 1e. Existing Unpermitted Connection (Constructed Before 7/12/07)

2. List, in descending order of significance, the Standard Industrial Classification (SIC) codes, which best describe the facility producing the discharge in terms of the principal products or services provided. Also, specify each classification title. (See Appendix B in the Instructions)

4911 (2a. SIC Code)	Generation of electric energy for sale (Description)
2b. SIC Code	Description
2c. SIC Code	Description
2d. SIC Code	Description

3. List all sewer connection(s) and their maximum daily flow(s) in gallons per day (GPD) from your facility going to the Publicly Owned Treatment Works (POTW):

	1 3a. Connection #	n/a 3b. Connection #	 3c. Connection #	3d. Total Flow, All Connections
SANITARY	10,080 GPD	 GPD	 GPD	10,080 GPD
INDUSTRIAL	440,000 GPD	 GPD	 GPD	440,000 GPD
TOTAL	450,000 GPD	 GPD	 GPD	450,000 GPD

4. Are you in compliance with the Massachusetts Historical Commission requirements?

☒ Yes ☐ No* *If No, You Must Comply With Massachusetts Historical Commission Requirements **BEFORE** You Can Submit This Application.

5. Are you in compliance with Massachusetts Environmental Policy Act (MEPA) requirements?

☒ Yes ☐ No* *If No, You Must Comply With MEPA Requirements **BEFORE** You Can Submit This Application.

B. Industrial Wastewater Information (continued)

6. Check all pollutants that are present in your industrial wastewater **before** pretreatment, or if not treated, before discharge:

☒ 6a. Metals, Asbestos, Cyanide, Phenols

If Metals, Asbestos, Cyanide, or Phenols are present, provide concentrations in milligrams per liter (mg/L):

1. Antimony (total) (Sb)	mg/L	9. Nickel (total) (Ni)	mg/L
2. Arsenic (total) (As)	mg/L	10. Selenium (total) (Se)	mg/L
3. Beryllium (total) (Be)	mg/L	11. Silver (total) (Ag)	mg/L
4. Cadmium (total) (Cd)	mg/L	12. Thallium (total) (Tl)	mg/L
5. Chromium (hexavalent)	mg/L	13. Zinc (total) (Zn)	See Table 1 mg/L
6. Chrome (total) (Cr)	mg/L	14. Asbestos	mg/L
7. Copper (total) (Cu)	See Table 1 mg/L	15. Cyanide (total) (CN)	mg/L
8. Lead (total) (Pb)	See Table 1 mg/L	16. Phenols (total)	mg/L

☒ 6b. Toxic Pollutants (See Section 17B in the Instructions.)

If Toxic Pollutants are present, provide the total Toxic Pollutants concentration in micrograms per liter (ug/L):

< 4 ug/l detected 1998-2002: monitoring for VOCs, SVOCs removed at 2002 permit renewal

NOTE: Use the **Toxic Pollutants Form** to list individual toxic chemicals and their concentrations.

☐ 6c. Total Petroleum Hydrocarbons (TPH) > 15 mg/L

☐ 6d. pH <5 and >10 Standard Units (S.U)

☒ 6e. Other*

*If Other Pollutants are present, describe them:

See Table 1 in the Supplement (Attachment 2.)

B. Industrial Wastewater Information (continued)

7. Is Mercury (Hg) present in your industrial wastewater **before** pretreatment, or if not treated, before discharge?

☐ Yes ☒ No* *If No, skip to Question 8.

7a. If Yes, have you identified all possible mercury sources and taken all reasonable steps to eliminate the mercury?

☐ Yes* ☐ No *If Yes, skip to Question 8.

7b. If No, explain why.

NOTE: As of May 1, 2009, all facilities must meet a discharge limit of 1 part per billion (ppb) for Mercury.

8. What is the name of the Publicly Owned Treatment Works (POTW) that receives your wastewater? (See Appendix C in the Instructions.)

Milford Wastewater Treatment Facility
Name of POTW

9. Do you have a current sewer connection discharge permit or a current written approval issued by your local POTW? (See Section 17B in the Instructions.)

☒ Yes ☐ No* *If No, you must obtain either a permit or, if a permit is not required, a written approval from your local POTW to discharge **BEFORE** you can submit this application.

If you have a permit, provide the following information, then skip to Question 10.

W026546
9a. Permit Number

3/10/08
9b. Permit Expiration Date

If you have a written approval, provide the following information:

NA
9c. Date of Approval Letter

NA
9d. Name of Person Who Signed the Letter

10. Are your POTW and local Sewer Authority the same entity? (See Section 17B in the Instructions.)

☒ Yes* ☐ No *If Yes, skip to Question 12.

B. Industrial Wastewater Information (continued)

11. Do you have a current sewer connection discharge permit or a current written approval issued by your local Sewer Authority? (See Section 17B in the Instructions.)

☐ Yes ☐ No* If No, you must obtain either a permit or written approval from your local Sewer Authority to discharge **BEFORE** you can submit this application.

If you have a permit, provide the following information, then skip to Question 12.

11a. Permit Number

11b. Permit Expiration Date

If you have a written approval, provide the following information:

11c. Date of Approval Letter

11d. Name of Person Who Signed the Letter

12. Is your facility currently classified as a Categorical Industrial User (CIU) pursuant to Federal Regulations? (See Appendix D in the Instructions.)

☒ Yes ☐ No* *If No, skip to Section C.

12a. List all the Categorical Pretreatment Standards applicable to your facility.

40 CFR 423.17 12a1. Part Number	Steam Electric Power Generating Point Source Category
12a2. Part Number	Point Source Category
12a3. Part Number	Point Source Category
12a4. Part Number	Point Source Category

C. Industrial Wastewater Pretreatment System

1. Do you have an on-site industrial wastewater pretreatment system (IWPS) to treat your industrial wastewater?

☒ Yes ☐ No* *If No, skip to Section D.

1a. How many IWPSs do you have?

1
Number

NOTE: If you have more than one IWPS, please use an **Additional IWPS Form** for each additional IWPS.

1b. Provide a unique identifier (i.e. name) for this IWPS:

pH Adjustment System
Identifier/Name

C. Industrial Wastewater Pretreatment System (continued)

1c. What is the Total Design Capacity of this IWPS?

58,000
Gallons Per Day

1d. What is the Average Daily Flow of this IPWS? (Estimate if this is a new facility.)

29,000 (Note: Batch operation ~ 1/wk; Apr - Nov & ~ 1/month Dec – May.)
Gallons Per Day

1e. What is the Maximum Daily Flow of this IWPS? (Estimate if this is a new facility.)

58,000
Gallons Per Day

2. Is your IWPS designed and constructed to meet all local discharge standards and the applicable Categorical Industrial User (CIU) standards in 40 CFR Chapter I, Subchapter N?

☒ Yes ☐ No* *If No, you must take immediate steps to address the non-compliance **BEFORE** you can submit this application.

3. Does this IWPS treat hazardous industrial wastewater or hazardous industrial wastewater sludge as defined in 314 CMR 7.02?

☐ Yes ☒ No* *If No, skip to Question 12.

3a. Are you treating concentrated chemical baths, e.g. spent chemical baths, or off-specification products?

☐ Yes ☐ No* *If No, skip to Question 4.

3b. If Yes, describe the concentrated chemical baths you are treating.

4. Does your IWPS meet the requirements of "treatment which is an integral part of the manufacturing process" as defined in 310 CMR 30.010?

☐ Yes* ☐ No *If Yes, skip to Question 7.

5. Do you store hazardous industrial wastewater or hazardous industrial wastewater sludge that is generated in your IWPS or in your production processes, in tanks or containers?

Note: If you use in-ground tanks for storage of hazardous industrial wastewater or sludge and your IWPS is located in a Drinking Water Zone (see Section 17C of the Instructions; reference language in 310 CMR 30.605), you are not eligible to apply for a BWP IW 38 or BWP IW 39 permit. You must use form BWP IW 40 instead.

☐ Yes ☐ No* *If No, skip to Question 7.

C. Industrial Wastewater Pretreatment System (continued)

6. Are you in compliance with the requirements for tanks and containers in 310 CMR 30.342 and 343? (See Section 17C in the Instructions)

☐ Yes ☐ No* *If No, you must take immediate steps to address the non-compliance **BEFORE** you can submit this application.

7. Do you have a U.S. Environmental Protection Agency (EPA) hazardous waste generator identification number?

☐ Yes ☐ No* *If No, skip to Question 7b.

7a. What is your EPA identification number?

_____ Skip to Question 8.
EPA ID #

7b. Explain why you do not have an EPA identification number.

_____

_____

_____

8. Do you have a visible sign in place that warns against unauthorized entry into the IWPS area?

☐ Yes* ☐ No *If Yes, skip to Question 9.

8a. Explain why you do not have a visible sign in place.

_____

_____

_____

9. Do you have the required spill containment for the IWPS? (See Section 17C in the Instructions.)

☐ Yes* ☐ No *If Yes, skip to Question 10.

9a. Explain why you do not have the required spill containment.

_____

_____

_____

10. Is your IWPS located on land subject to flooding from a 100-year storm? (See Section 17C in the Instructions.)

☐ Yes ☐ No* *If No, skip to Question 12.

C. Industrial Wastewater Pretreatment System (continued)

11. Are you in compliance with the flood-proofing provisions in 310 CMR 30.701(2)? (See Section 17C in the Instructions.)

☐ Yes ☐ No* *If Yes, skip to Question 12.

11a. Explain why you are not in compliance with the flood-proofing provisions in 310 CMR 30.701(2).

_____

_____

_____

12. What type of IWPS do you have? (Check all that apply.)

☒ Fully Automated Industrial Wastewater Pretreatment System (FAIWPS)

☐ Continuous Discharge IWPS ☒ Batch IWPS

13. Is the IWPS exempt from classification? (See Section 17C in the Instructions.)

☐ Yes* ☒ No *If Yes, skip to Question 14.

13a. What is the classification of this IWPS? (See 257 CMR 2.13: Classification of Wastewater Treatment Facilities.)

☒ Class 1I	☐ Class 2I	☐ Class 3I
☐ Class 4I	☐ Class 5 or 6C	☐ Class 1M
☐ Class 2M	☐ Class 3M	☐ Class 4M

13b. How was the IWPS' classification determined?

☐ In accordance with the requirements in 314 CMR 7.05(2)(g) 4. c. or d.

☐ By the Board of Certification of Operators of Wastewater Treatment Facilities

☒ Both

14. Is the IWPS staffed in accordance with the requirements of 314 CMR 7.05(2)(g) 5? (See Section 17C in the Instructions.)

☒ Yes* ☐ No *If Yes, skip to Question 15.

C. Industrial Wastewater Pretreatment System (continued)

14a. Explain why the IWPS is not staffed in accordance with 314 CMR 7.05(2)(g) 5.

15. Is this your first permit application under Permit Category BWP IW 38 or BWP IW 39 for this IWPS? Or, is this application a request for modification of this IWPS that currently has a BWP IW 38 or BWP IW 39 permit?

☒ Yes* ☐ No

*If Yes, you need to submit as an attachment the process flow diagram and description of the principal treatment processes for your IWPS. Otherwise, skip to Question 17.

16. How many attachments are included with this application in response to Question 15?

2; See Supplement and corresponding P&ID. (Attachment 2.)
Number of Attachments

17. Have your sewer connection and IWPS been designed and constructed in compliance with the design and construction standards as set forth in 314 CMR 7.05(2)(g)3?

☒ Yes ☐ No* *If No, skip to Question 17b.

17a. What is the Massachusetts Registered Professional Engineer (MAPE) signature date on the engineering plans?

See Supplement
Date

Skip to Question 18.

17b. Explain why your sewer connection and IWPS have not been designed and constructed in compliance with the design and construction standards as set forth in 314 CMR 7.05(2)(g)3.

18. Provide the following information about the Massachusetts Registered Professional Engineer (MAPE) who reviewed, stamped, and signed your engineering plans:

Mr. Michael F. Delleo, Jr (also see Supplement)
18a. Name

Unknown (also see supplement)
18b. Phone Number

33806
18c. Mass. P.E. License Number

Chemical
18d. Mass. P.E. Specialty

C. Industrial Wastewater Pretreatment System (continued)

19. Do you have an IWPS operation and maintenance manual that complies with the procedures and other requirements in 314 CMR 7.05(2)(g)6.?

☒ Yes* ☐ No *If Yes, skip to Question 20.

19a. Explain why you do not have the required IWPS operation and maintenance manual.

20. Are you keeping your IWPS operation and maintenance manual current?

☒ Yes ☐ No

21. Are you implementing your IWPS operation and maintenance manual?

☒ Yes ☐ No

D. Monitoring, Reporting & Recordkeeping

1. Are you keeping your currently effective sewer discharge permit(s), IWPS plan(s), and current operation and maintenance manual(s) (as applicable) on-site at all times?

☒ Yes* ☐ No * If Yes, skip to Question 2.

1a. Explain why you are not keeping these records on-site at all times.

2. Are you keeping all your required records including your wastewater monitoring and analyses records, operation and maintenance records and logs, bills of lading, summary reports of all incidents requiring implementation of the safety plan, and hazardous waste manifests (as applicable) on-site for at least three years?

☒ Yes* ☐ No * If Yes, skip to Question 3.

2a. Explain why you are not keeping these records on-site for at least three years.

D. Monitoring, Reporting & Recordkeeping (continued)

3. [Reserved for Toxics Reporting]

Additional reporting requirements will be added to this section in the future.

E. General & Specific Prohibitions

1. After carefully reviewing all of the general and specific prohibitions listed below, are you in compliance with these General and Specific Prohibitions?

☒ Yes* ☐ No *If Yes, read Section F and then complete Section G.

1a. Identify all the prohibitions you are not in compliance with and explain why. Attach an additional sheet of paper to this form, if necessary.

1. General Prohibitions. The permittee shall not:

a. Discharge, or cause to be discharged to a POTW, any substances, materials, or wastewater that may:

i. harm the sewers, POTW wastewater treatment process or equipment;
ii. have an adverse impact on the receiving waters; or
iii. otherwise create a nuisance or endanger public health, safety, or the environment.

b. Introduce pollutants into POTWs that pass through the POTW or interfere with its operation or performance.

c. Discharge wastewater or allow discharge of wastewater through any sewer connection that would result in a hazard to the public health or safety.

d. Discharge bypass wastewater or allow discharge of bypass wastewater through any sewer connection. If bypassing due to an emergency condition occurs, the Department and POTW shall be notified in accordance with 314 CMR 7.04(3). Such notification or its acknowledgement shall not be construed as permission by the Department or POTW to discharge bypass wastewater.

e. Discharge hazardous waste or allow the discharge of hazardous waste through any sewer connection.

2. Specific Prohibitions. The permittee shall not introduce into a POTW or its wastewater collection system the following:

a. Pollutants which may create a fire, explosion, or other hazard in the POTW or its wastewater collection system.

b. Pollutants which may cause corrosive structural damage to the POTW or its wastewater collection system. In no case shall discharges with a pH lower than 5.0 Standard Unit (S.U) or more than 10.0 S.U. be allowed, unless the local limit allows such discharges.

c. Solid or viscous pollutants in amounts which may cause obstruction to the flow in the POTW or its wastewater collection system or may result in interference.

d. Any pollutant, including oxygen-demanding pollutants, discharged at a flow rate or pollutant concentration that will cause interference with the POTW or its wastewater collection system.

e. Heat in amounts which may inhibit biological activity in the POTW, resulting in interference. In no case shall heat in such quantities that the temperature at the POTW treatment plant exceeds 40° C (104° F) be discharged, unless the Department, upon request of the POTW, approves alternate temperature limits.

F. Additional Conditions

a. All discharges shall be in compliance with the terms and conditions of this permit. The discharge of any wastewater at a level in excess of that identified and authorized by this permit shall constitute a violation of the terms and conditions of this permit. Such a violation may result in the imposition of civil and/or criminal penalties as provided for in M.G.L. c.21, Section 42.

b. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to, the following:

i. Violation of any terms or conditions of the permit;

ii. Obtaining a permit by misrepresentation or failure to disclose fully all relevant facts; or

iii. A change in conditions or the existence of a condition, which requires either a temporary or permanent reduction, or elimination of the authorized discharge.

c. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges; nor does it authorize or relieve the permittee of any liability for any injury to private property or any invasion of personal rights; nor any infringement of Federal, State, or local laws or regulations; nor does it waive the necessity of obtaining any local assent required by law for the discharge authorized herein by the Department.

d. The provisions of this permit are severable, and the invalidity of any condition or subdivision thereof shall not make void any other condition or subdivision thereof.

e. All information and data provided by an applicant or a permittee identifying the nature and frequency of a discharge shall be available to the public without restriction. All other information (other than effluent data) which may be submitted by an applicant in connection with a permit application shall also be available to the public unless the applicant or permittee is able to demonstrate that the disclosure of such information or particular part thereof to the general public would divulge methods or processes entitled to protection as trade secrets in accordance with the provisions of M.G.L. c.21, Section.27(7). Where the applicant or permittee is able to so demonstrate, the Department shall treat the information or the particular part (other than effluent data) as confidential and not release it to any unauthorized person. Such information may be divulged to other officers, employees, or authorized representatives of the Commonwealth or the United States Government concerned with the protection of public water or water supplies.

f. Transfer of Permits. Any sewer system connection permit authorizing an industrial discharge to a sewer system is only valid for the person to whom it is issued, unless prior to transfer:

i. The current permittee notifies the Department in writing at least 30 days in advance of the proposed transfer date; and

ii. The notice includes a written agreement between the existing and new permittees containing a specific date for transfer of permit responsibilities, and liability to the new permittee.

g. This permit authorizing the discharge expires five (5) years from the date of issuance. The permittee shall apply for a renewal of this permit at least ninety (90) days prior to the expiration date, in accordance with 314 CMR 7.09(3)(b) for continued lawful discharges beyond the expiration date.

h. All solids, sludge, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be collected, treated, and disposed of in accordance with applicable provisions in the following:

i. Hazardous waste regulations (310 CMR 30.000).

ii. Solid waste regulations (310 CMR 19.00).

iii. Sewer discharge regulations (314 CMR 7.00).

iv. Any other applicable federal, state and local laws.

i. All samples shall be analyzed by a Massachusetts Certified Laboratory.

j. The permittee shall provide the Department, and the Department's employees, authorized representatives and contractors, access at to the facility at all reasonable times, including during wastewater treatment system operation or wastewater discharge, for purposes of conducting activities related to oversight of this permit, including inspections to monitor compliance with the terms herein. The permittee shall allow the Department to obtain information related to compliance with the requirements of this permit. Notwithstanding any provision of this permit, the Department retains all of its access authorities and rights under applicable state and federal law.

Massachusetts Department of Environmental Protection
Bureau of Waste Prevention – Industrial Wastewater

BWP IW 38 & BWP IW 39

Permit for Industrial Sewer User

W901320
Transmittal Number

1201504 (AQ#)
{FMF # 204932}
Facility ID# (if known)

G. Certification Statement

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true accurate, and complete. I certify that this facility is in compliance with all conditions and requirements of this permit, and all applicable statutes and regulations. I further certify that systems to maintain compliance are in place at the facility or unit and will be maintained even if processes or operating procedures are changed. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment of knowing violations."

(I will be responsible for publication of public notice of the applicable permit proceedings identified under 314 CMR 2.06(1)(a) through (d).)

Michael L. Volpe
Printed Name of Applicant

Plant Manager
Title

Robert K. Mayginnis/for MICHAEL L. VOLPE
Signature of Applicant

01-21-2008
Date Signed

James W. Jolley
Name of Preparer

Senior Engineer
Title

978-589-3093
Phone Number

MassDEP Use Only

Special Conditions:

See Attachment 1.

This document is a permit issued pursuant to Massachusetts General Laws, Chapter 21, Section 43 and Massachusetts regulations at 314 CMR 7.00. The permittee shall comply with all of the provisions contained in the permit application which are hereby incorporated and made part of this permit.

04/09/08
Date Issued

04/09/08
Permit Effective Date

04/09/13
Permit Expiration Date

John F. Kronopolus
Name of Regional BWP Section Chief

John F Kronopolus
Signature

ATTACHMENT 1.

Special Conditions:

1. The permittee shall maintain compliance with the Town of Milford's sewer use requirements and the terms and conditions of any applicable wastewater discharge permits issued by the Milford Wastewater Treatment Facility.

2. The permittee shall comply with the Effluent Guidelines and Standards at 40 CFR, Chapter I, Subchapter N, Part 423 – Steam Electric Power Generating Point Source Category.

3. The permittee shall notify MassDEP of additional Effluent Guidelines and Standards as they are determined to be applicable to the facility.

4. The documents and materials attached to and referenced in the permit application are incorporated as part of the permit, except for the information pertaining to the request to incorporate the changes to the sewer extension permit, Transmittal Number W027308.

Massachusetts Department of Environmental Protection
Bureau of Waste Prevention – Industrial Wastewater

Toxic Pollutants Form

Use With BWP IW 38 & BWP IW 39

W901320
Transmittal Number
1201504 (AQ#)
{FMF # 204932}
Facility ID# (if known)
BWP IW 38 & BWP IW 39

Instructions: For the following groups of pollutants, check all that you know to be present in your industrial wastewater before pretreatment, and provide concentrations for the specific pollutants in the checked group(s).

☒ **100. Volatiles**

For all Volatile Organic Compounds (VOCs), provide concentrations in micrograms per liter (ug/L):

Pollutant Name	Concentration
101. acrolein	ug/L
102. acrylonitrile	ug/L
103. benzene	ug/L
104. bis (chloromethyl) ether	ug/L
105. bromoform	ug/L
106. carbon tetrachloride	ug/L
107. chlorobenzene	ug/L
108. chlorodibromomethane	ug/L
109. chloroethane	ug/L
110. 2-chloroethylvinyl ether	ug/L
111. chloroform	3.18 avg of 8 semi-annual samples from 1998 to 2002**
112. dichlorobromomethane	0.69 avg of 8 semi-annual samples from 1998 to 2002**
113. dichlorodifluoromethane	ug/L
114. 1,1-dichloroethane	ug/L
115. 1,2-dichloroethane	ug/L
116. 1,1-dichloroethylene	ug/L
117. 1,2-dichloropropane	ug/L
118. 1,2-dichloropropylene	ug/L
119. ethylbenzene	ug/L
120. methyl bromide	ug/L
121. methyl chloride	ug/L

100. Volatiles (continued)

Pollutant Name	Concentration
122. methylene chloride	ug/L
123. 1,1,2,2-tetrachloroethane	ug/L
124. tetrachloroethylene	ug/L
125. toluene	ug/L
126. 1,2-trans-dichloroethylene	ug/L
127. 1,1,1-trichloroethane	ug/L
128. 1,1,2-trichloroethane	ug/L
129. trichloroethylene	ug/L
130. trichlorofluoromethane	ug/L
131. vinyl chloride	ug/L

☐ **200. Acid Compounds**

For all Acid Compounds, provide concentrations in micrograms per liter (ug/L):

Pollutant Name	Concentration
201. 2-chlorophenol	ug/L
202. 2,4-dichlorophenol	ug/L
203. 2,4-dimethylphenol	ug/L
204. 4,6-dinitro-o-cresol	ug/L
205. 2,4-dinitrophenol	ug/L
206. 2-nitrophenol	ug/L
207. 4-nitrophenol	ug/L
208. p-chloro-m-cresol	ug/L
209. pentachlorophenol	ug/L
210. phenol	ug/L
211. 2,4,6-trichlorophenol	ug/L

☐ **300. Base/Neutral Compounds**

For all Base/Neutral Compounds, provide concentrations in micrograms per liter (ug/L):

Pollutant Name	Concentration
301. acenaphthene	ug/L
302. acenaphthylene	ug/L
303. anthracene	ug/L
304. benzidine	ug/L
305. benzo(a)anthracene	ug/L
306. benzo(a)pyrene	ug/L
307. 3,4-benzofluoranthene	ug/L
308. benzo(ghi)perylene	ug/L
309. benzo(k)fluoranthene	ug/L
310. bis(2-chloroethoxy)methane	ug/L
311. bis(2-chloroethyl)ether	ug/L
312. bis(2-chloroisopropyl)ether	ug/L
313. bis(2-ethylhexyl)phthalate	ug/L
314. 4-bromophenyl phenyl ether	ug/L
315. butylbenzyl phthalate	ug/L
316. 2-chloronaphthalene	ug/L
317. 4-chlorophenyl phenyl ether	ug/L
318. chrysene	ug/L
319. dibenzo(a,h)anthracene	ug/L
320. 1,2-dichlorobenzene	ug/L
321. 1,3-dichlorobenzene	ug/L
322. 1,4-dichlorobenzene	ug/L
323. 3,3'-dichlorobenzidine	ug/L

300. Base/Neutral Compounds (continued)

Pollutant Name	Concentration
324. diethyl phthalate	ug/L
325. dimethyl phthalate	ug/L
326. di-n-butyl phthalate	ug/L
327. 2,4-dinitrotoluene	ug/L
328. 2,6-dinitrotoluene	ug/L
329. di-n-octyl phthalate	ug/L
330. 1,2-diphenylhydrazine (as azobenzene)	ug/L
331. fluoranthene	ug/L
332. fluorine	ug/L
333. hexachlorobenzene	ug/L
334. hexachlorobutadiene	ug/L
335. hexachlorocyclopentadiene	ug/L
336. hexachloroethane	ug/L
337. indeno(1,2,3-cd)pyrene	ug/L
338. isophorone	ug/L
339. naphthalene	ug/L
340. nitrobenzene	ug/L
341. N-nitrosodimethylamine	ug/L
342. N-nitrosodi-n-propylamine	ug/L
343. N-nitrosodiphenylamine	ug/L
344. phenanthrene	ug/L
345. pyrene	ug/L
346. 1,2,4-trichlorobenzene	ug/L

☐ **400. Pesticides**

For all Pesticides, provide concentrations in micrograms per liter (ug/L):

Pollutant Name	Concentration
401. aldrin	ug/L
402. alpha-BHC	ug/L
403. beta-BHC	ug/L
404. gamma-BHC	ug/L
405. delta-BHC	ug/L
406. chlordane	ug/L
407. 4,4'-DDT	ug/L
408. 4,4'-DDE	ug/L
409. 4,4'-DDD	ug/L
410. dieldrin	ug/L
411. alpha-endosulfan	ug/L
412. beta-endosulfan	ug/L
413. endosulfan sulfate	ug/L
414. endrin	ug/L
415. endrin aldehyde	ug/L
416. heptachlor	ug/L
417. heptachlor epoxide	ug/L
418. PCB-1242	ug/L
419. PCB-1254	ug/L
420. PCB-1221	ug/L
421. PCB-1232	ug/L
422. PCB-1248	ug/L
423. PCB-1260	ug/L

400. Pesticides

Pollutant Name	Concentration
424. PCB-1016	ug/L
425. toxaphene	ug/L

500. Total Toxic Pollutants* ug/L

*Use this total in your answer to Question 6b in Section B of the BWP IW 38 & BWP IW 39 Permit for Industrial Sewer User application

Milford Power Limited Partnership
Supplement to Sewer Connection Permit Application
BWP IW 39 - Transmittal Number W901320
Permit No. W026546

Section B, Item 5: Are you in compliance with the Massachusetts Environmental Policy Act (MEPA) requirements?

The original Milford Power project, which consisted of the building and operation of a natural gas-fired generating facility, required filing under 301 CMR 11.00 under MEPA. The requirements of these regulations were met prior to the submittal of the original permit application. The Environmental Notification Form was published in the Monitor on June 11, 1990. The Draft Environmental Impact Report (EIR) was submitted in January of 1991 and the Final EIR was submitted in May, 1991. The EOEA number for this project is 8270. The Final EIR MEPA Certificate was issued on June 10, 1991 and a copy was included in the original permit application (Transmittal No. 24632). The renewal of the Sewer Connection Permit is not subject to review under 301 CMR 11.00.

Section B, Item 6: Check all pollutants that are present in your industrial wastewater before pretreatment, of if not treated, before discharge.

The discharge is a combination of sanitary sewage and blowdown from the boilers, cooling towers and demineralizer systems. The influent to the Milford Power system is a combination of potable water obtained from the Milford Water Company and effluent from the Milford Wastewater Treatment Facility (MWWTF). MWWTF effluent is concentrated by the action of the cooling towers.

Industrial effluent monitoring and sampling have been conducted within the facility at a location specified by MWWTF staff. The results of this monitoring are summarized in the attached Table 1, which includes the results of the continuous monitoring (flow, pH, temperature and conductivity).

Section B, Item 6b: If Toxic Pollutants are present, provide the total Toxic Pollutants concentration in ug/l.

For Informational purposes: During the facility permit renewal in 2002, the semi-annual monitoring requirements for VOCs, SVOCs, and PCB/Pesticides were removed from the permit as analytical results for the 5-year permit period indicated that concentrations for these parameters were below or slightly higher than the detection limits. Only concentrations of three VOCs were detected in the 8 semi-annual samples collected from 1998 to 2002. These included chloroform (average of 3.18 ug/l at an RDL of 1.5 ug/l), bromodichloromethane (average of 0.69 ug/l at an RDL of 1.0 ug/l) and acetone (average of 7.5 ug/l at an RDL of 10 ug/l). The analytical results from the semi-annual monitoring for SVOCs, and PCB/Pesticides indicated concentrations below the detection limits.

Section C, Item 15: Is this your first permit application under Permit Category BWP IW 38 or BWP IW 39 for this IWPS? Or, is this application a request for modification of this IWPS that currently has a BWP IW 38 or BWP IW 39 permit? (Re: IWPS principal treatment processes description.)

Raw water is demineralized by use of cation, ion, and mixed bed vessels within the demineralization building. Several floor drains are also in the demineralization building.

When the demineralizing beds are exhausted, the demineralization beds are regenerated with caustic and acid. Regeneration wastewater effluent is routed to the neutralization aboveground storage tank. The demineralization building floor drains are also routed to neutralization aboveground storage tank.

Prior to discharge, acid is added into the neutralization tank by two neutralization injection pumps. Two neutralization circulating pumps re-circulate the stored effluent in the neutralization tank to aide in mixing of the water with the injected acid.

The neutralization process is manually initiated from the control room by the certified wastewater control room operator. This automated process injects acid for a period of two minutes then allowed to stabilize for five minutes while the wastewater is continuously re-circulated. This automated process will continue until wastewater effluent pH reading stabilizes between 6.5 and 9.5 within the neutralization tank. Once the wastewater is stabilized and pH is in range, the neutralizing re-circulating process automatically stops. When the neutralization process is completed, the tank is pumped down and discharged to the POTW.

Enclosed is the neutralization process P&ID for your review.

Section C, Items 17a and 18: Name and Address of Massachusetts Registered Professional Engineer Designing the Proposed System:

Mr. Michael F. Delleo, Jr., chemical PE number 33806, approved and stamped the original drawing dated 10-11-1991. Because the original submittal date was 1991, Milford Power no longer is in contact w/ Mr. Delleo and subsequently do not know any contact information.

No design work has been performed on the system since the submittal of the original permit application (Transmittal No. 24632) dated 1991. The MA Registered Professional Engineer information responsible for the original system is available in that Transmittal. No MA Registered Professional Engineer is provided in this application as none was employed.

Similarly, because no design work has been performed, engineering reports and plans were not produced for this application.

Because the manufacturing processes, water balance, wastewater contributing process lines and pollution prevention techniques have not changed since the original application was submitted, a description of these items is not repeated here.

Table 1: Summary of Data Collected from August 2004 through July 2007
Supplement to Sewer Connection Permit Application - Transmittal #: W901320

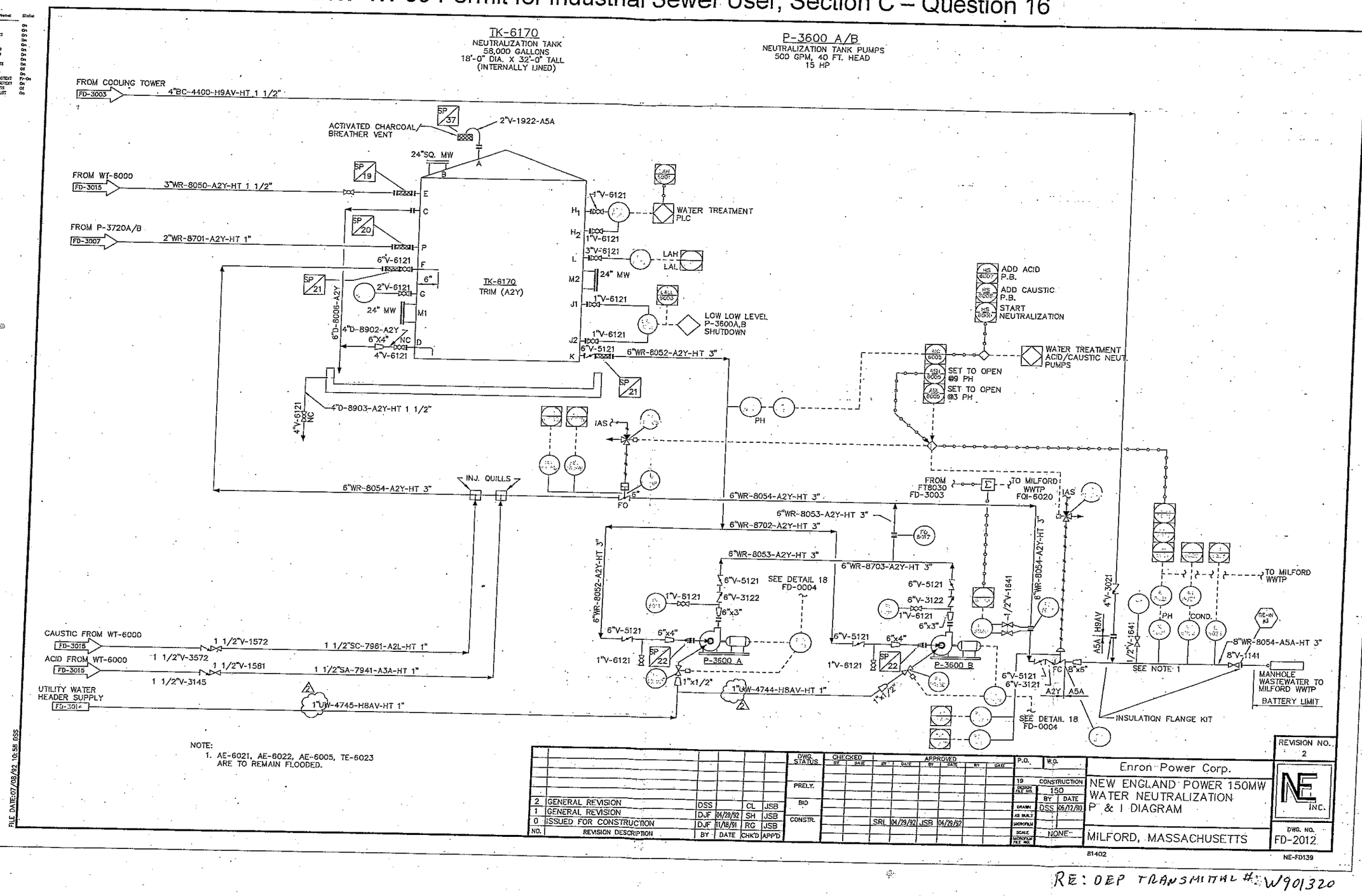
Pollutant	Town of Milford Pretreatment Limit[1]	Monitoring Frequency	Maximum Value (concentration)	Minimum Value (concentration)	Average Value (concentration)
TSS, mg/L	200	Twice Annually	7	3	3
COD, mg/L	400	Twice Annually	140	10	70
Boron, mg/l	5	Twice Annually	1.46	0.20	0.69
Lead, mg/L	0.69	Twice Annually	0.005	0.005	0.005
Zinc, mg/L	2.61	Twice Annually	0.25	0.11	0.15
Copper, mg/L (total)	3.38	Quarterly	0.03	0.01	0.02
Oil and Grease, mg/L	100	Monthly	22.0	2.2	2.8
Aluminum, mg/L (total)	2	Monthly	0.36	0.05	0.11
Flow (gpd)	-	Continuous[2]	353,211	0	29,129
pH, standard units	5.5 to 9.5	Continuous	9.3	5.8	8.3
Conductivity umhos/cm	7200	Continuous	9410	18	2921
Temperature (Degree, F)	104	Continuous	97	46	69

Notes:

1: From Table 1 of "Attachment 1: MPLP Effluent Quality Monitoring Plan

2: The data from the continuous monitoring is based on the daily average of the hourly measurements.

Milford Power, LP – pH Adjustment System
Re: BWP IW 39 Permit for Industrial Sewer User; Section C – Question 16



RE: DEP TRANSMITTAL #: W901320